

**TELAMON CORPORATION  
DELAWARE**

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**AUDIT REPORT ON  
U.S. DEPARTMENT OF LABOR GRANT  
NUMBER AC-10741-00-55**

Performance Audit for  
Program Year July 1, 2000 through June 30, 2001

This audit was performed by Harper, Rains, Stokes & Knight, P.A., Certified Public Accountants, under contract to the Inspector General, and, by acceptance, it becomes a report of the Office of Inspector General.

*Elisat P. Lewis*

Assistant Inspector General for Audit

**Report Number: 21-03-019-03-365**

**Date Issued: September 30, 2003**

HARPER, RAINS  
STOKES & KNIGHT

Elliot P. Lewis  
Assistant Inspector General  
For Audit  
Office of Inspector General  
U.S. Department of Labor  
Washington, D.C. 20210

Dear Mr. Lewis:

We were engaged to perform a performance audit of National Farmworker Jobs Program Grant AC-10741-00-55 awarded to Telamon Corporation - Delaware (TCD) by DOL. The audit was to determine whether the costs claimed by TCD for the period July 1, 2000 through June 30, 2001, were reasonable, allowable, and allocable under the cost principles set forth in OMB Circular A-122 and grant guidelines and whether the performance reported was accurate and properly supported. We were also to report our findings and recommendations in accordance with Government Auditing Standards issued by the Comptroller General of the United States. Such standards require that we objectively and systematically examine evidence to provide an independent assessment of the performance of a government organization, program, activity, or function. We believe our audit provides such an assessment.

This performance audit was designed to provide reasonable assurance about compliance with significant laws, regulations, and other compliance requirements and to obtain an understanding of management controls that are relevant to the audit. For those management controls determined to be significant to the audit, we obtained sufficient evidence to support our judgments about those controls. An audit made in accordance with these standards provides reasonable assurance that its objectives have been achieved; but it does not guarantee the discovery of illegal acts or abuse. Our findings section of the performance report provides our conclusions on TCD's compliance and controls.

*Harper, Rains, Stokes & Knight, P.A.*

February 8, 2002

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## ACRONYMS

- CFR - Code of Federal Regulations
- DOL - U.S. Department of Labor
- DSFP - Division of Seasonal Farmworkers Programs
- ESL - English as a Second Language
- ETA - Employment and Training Administration
- FSR - Financial Status Report
- GED - General Equivalency Diploma
- NFJP - National Farmworker Jobs Program
- OMB - Office of Management and Budget
- OIG - Office of Inspector General
- TCD - Telamon Corporation of Delaware
- WIA - Workforce Investment Act

## EXECUTIVE SUMMARY

The U.S. Department of Labor (DOL), Office of Inspector General (OIG), contracted with Harper, Rains, Stokes, & Knight P.A., to perform an audit of the Workforce Investment Act's National Farmworker Jobs Program to determine whether the program was operating in accordance with applicable regulations. DOL provides 53 grants to states and nonprofit organizations to operate the program within 47 states and Puerto Rico. We selected a statistical sample of nine grantees for review. We tested the direct and indirect costs claimed for reimbursement by these grantees to determine if the costs claimed were reasonable, allowable and allocable under the terms of the grant agreement and the cost principles set forth in *OMB Circular A-122*, or *OMB Circular A-87*, as applicable. We also tested performance reported to determine whether it was accurate and properly supported. The Program was audited for program year 2000 (July 1, 2000 through June 30, 2001).

This report discusses the results of our audit of Telamon Corporation - Delaware (TCD) under DOL Grant Number AC-10741-00-55. Under the authority of the Workforce Investment Act of 1998 (WIA), DOL's Employment and Training Administration (ETA) awarded TCD a grant in the amount of \$125,899 to provide training and services to eligible migrant and seasonal farmworkers throughout the State of Delaware to strengthen their ability to achieve economic self-sufficiency. TCD operates a single office in Dover, providing core, intensive and training services to eligible farmworkers. During PY 2000, TCD placed 13 participants in unsubsidized jobs, and provided 135 with supportive services.

Our audit found that some participant files are not documented in compliance with laws and regulations. The costs incurred (\$684) on these improperly documented participants are questioned. We recommend that ETA recover the \$684.

The performance reported was found to be accurate and supported based on the testing we performed.

The auditee has provided a written response included as Appendix A in this report. No changes in our position were made as a result of the response.

## **INTRODUCTION AND BACKGROUND**

The Division of Seasonal Farmworker Programs (DSFP) within ETA is responsible for administering the National Farmworker Jobs Program (NFJP). The intent of NFJP, under section 167 of the Workforce Investment Act, is to strengthen the ability of eligible migrant and seasonal farmworkers and their families to achieve economic self-sufficiency through job training and other related services that address their employment related needs. Assistance from the NFJP is accessed through the NFJP grantee partners and local One-Stop Centers.

TCD, a 501(c)(3) organization, serves migrant and seasonal farmworkers and their families under the provision of the WIA grants. TCD has served the State of Delaware since 1979, educating, training and assisting those migrant and seasonal farmworkers who desire to leave the migrant stream. Within the State of Delaware, TCD administers NFJP from a single office in Dover, providing core, intensive and training services to eligible farmworkers.

TCD was awarded a grant in the amount of \$125, 899 to provide training and services to eligible migrant and seasonal farmworkers. Core services include outreach, admission and orientation as well as emergency assistance needed by farmworkers to sustain their participation in the agricultural workforce. Intensive Services include in-depth assessments and the development of an Individual Employment Plan. Training services are usually in the context of a classroom environment and are provided by institutions that subcontract with TCD on a per-participant basis, according to the objectives of the participant's Individual Employment Plan.

## OBJECTIVES, SCOPE, AND METHODOLOGY

The primary objectives of our audit were to determine whether the costs claimed by TCD for the period July 1, 2000 through June 30, 2001, under the DOL grant were reasonable, allowable, and allocable under the cost principles set forth in OMB Circular A-122 and grant guidelines and to determine that performance reported was accurate and properly supported.

Our audit was performed in accordance with the *Government Auditing Standards* issued by the Comptroller General of the United States. Our audit included such tests of the accounting records and other accounting procedures as we considered necessary in the circumstances.

Our audit was performed using the criteria we considered relevant. These criteria included those established by the Federal Government in: OMB Circulars A-110, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Non-Profit Organizations*, and A-122, *Cost Principles for Non-Profit Organizations*; the *Workforce Investment Act of 1998 (WIA)*; 20 CFR Part 669 *National Farmworker Jobs Program under Title 1 of the WIA*; and 29 CFR Parts 95 and 96, *Administrative Requirements and Audits of Federally Funded Grants, Contracts, and Agreements*.

### **Management Controls**

To meet the aforementioned objectives, we reviewed management controls over relevant transaction cycles. Our work on established management controls included obtaining and reviewing policies and procedures manuals, interviewing key personnel, and reviewing selected transactions to observe the controls in place. Our testing related to management controls was focused only on the controls related to our audit objectives of reviewing the reported cost and performance data and was not intended to form an opinion on the adequacy of management controls, and we do not render such an opinion. Weaknesses noted in our testing are discussed in the **Findings** section of this report.

### **Compliance with Laws & Regulations**

In order to determine compliance with the above-mentioned laws and regulations, we performed detailed tests of transactions and tested a sample of participants who were enrolled in the program during our audit period. Our detailed tests of transactions included both analytical review and substantive tests of accounts. Our testing related to compliance with laws and regulations was focused only on the laws and regulations relevant to our audit objectives of reviewing the reported cost and performance data and was not intended to form an opinion on the compliance with laws and regulations as a whole, and we do not render such an opinion. Instances of noncompliance are discussed in the **Findings** section of this report.

Our sample universe of participants included all participants terminating during the period. There were no participants that remained enrolled at the end of the program year. In program year 2000, TCD served 150 participants, and all exited the program during the year. Farmworkers who received emergency related assistance, most commonly food or transportation assistance, comprised the largest group served with a total of 135 participants (90 percent). The remainder was made up of unsubsidized employment placements with a total of 13 (9 percent) and 2 other terminations (1 percent). We reviewed a base sample of 42 participant files. Our sampling technique was a random selection so that all participants had an equal chance of being selected. Procedures performed on the selected participants included reviewing the eligibility determination, reviewing the types of services provided and the costs of those services, and reviewing the program outcome for those exiting the program.

The costs reported and performance reported by TCD are presented on the Schedules of Costs Reported and Performance Reported in this report. These schedules, included as schedules A and B, respectively, are based on the information reported to ETA in the Financial Status Report and the Program Status Summary.

#### **Entrance and Exit Conferences**

The fieldwork related to participant eligibility and program performance was performed at TCD's office in Dover, Delaware, during the period December 10 through December 20, 2001. Fieldwork related to the other direct program and administrative costs associated with TCD was performed at the corporate headquarters of Telamon Corporation, the parent company of TCD, in Raleigh, NC, during the period December 11, 2001 through February 8, 2002. The entrance conference for the latter segment of the fieldwork was held on December 11, 2001, during which we met with officials of Telamon Corporation to discuss the purpose, scope and timing of the audit work to be performed. We held an exit conference with these same officials on February 8, 2002, to discuss our findings and to obtain their comments.

#### **Auditee's Written Comments**

A draft copy of this report was provided to TCD on August 29, 2003. TCD provided their written response to the report September 13, 2003. The written response is included as Appendix A, beginning on page 12.



## FINDINGS

### **1. A Number of Participant Files Were Incomplete**

During program year 2000, TCD provided training and services to 150 participants. We selected a sample of 42 participants and found that the files for 10 or 23 percent of the participants in the sample lacked sufficient documentation to enable TCD to determine their eligibility.

To be eligible under NFJP, a person must be a disadvantaged migrant or seasonal farmworker, or their dependents who has been primarily employed in agricultural labor that is characterized by chronic unemployment or underemployment during the 12-month eligibility period (12 months within the 24 months immediately preceding the application for services), and:

- is a citizen, or someone authorized by the Attorney General to work in the U.S., and
- all male participants must have registered for military selective service.

A migrant farmworker is a seasonal farmworker whose agricultural labor requires travel to the job site, without being able to return home to his/her permanent residence the same day.

The Attachment to NFJP Bulletin No. 00-02, effective July 1, 2000, states that: “As part of their system of internal controls, grantees are expected to obtain source documentation that verifies the information provided by applicants covering such key eligibility elements as age, work history and earnings from agriculture labor, family size and income, work authorization, and compliance with Selective Service requirements.”

In addition, paragraph 669.360(b) of WIA states that: “In providing emergency assistance, the MSFW may use an abbreviated eligibility determination process that accepts the applicant’s self-attestation as final evidence of eligibility, except that self attestation may not be used to establish the requirements of legal working status in the United States, and Selective Service registration, where applicable.”

#### **10 of 42 Participants (23 Percent) Sampled Were Improperly Documented**

To determine how effective TCD was in selecting eligible participants, we selected a statistical sample of 42 TCD participants to test eligibility. Thirty-eight participants received emergency related assistance and the remaining 4 received employment referrals. At a minimum, there should be documents for all files that verify identity, work eligibility, and compliance with selective service registration as noted above. We reviewed the participants’ files and discovered that 10 did not contain the documentation required by regulations to support the participants’ eligibility. Therefore, TCD could not substantiate the eligibility of these participants.

The migrant program was charged \$684 for the food vouchers paid these participants, which we question. Based on the sample results the projected error for the sample universe would be \$2,442.\*

Weaknesses in TCD's internal control system allowed potentially ineligible participants to be served. Therefore, TCD needs to strengthen its internal controls over participant selection by developing a policy that prohibits the payment of funds to any participant until that participant has provided sufficient documentation to determine they are eligible.

### ***Auditee's Response***

. . . It is our contention that the process of requesting documents, reviewing and copying or making notations of them constitutes compliance with the NFJP guidelines in this regard. . . .

. . . It is further critical to note, as the reviewers did, that funds expended in these cases were nominal emergency assistance amounts; and that when participants desire to enter training, additional verification procedures are in place to prevent misexpenditures on ineligible applicants. In this regard, we request relief of these questioned costs under sections 184 (c) and (d) of the Workforce Investment Act and section 677.720 of WIA regulations.

### ***Auditors' Comments***

All the files in question did not contain the minimal evidence to establish legal working status as required by regulations. Only recording a number of a document viewed in the file is not sufficient auditable evidence. We understand that on occasion it may not be possible to copy all documents for the file. We have noted that some grantees will require an affidavit by the staff member certifying the examination of the documents. This is an acceptable alternative to having the document copied for the file.

### **RECOMMENDATION:**

We recommend that the Assistant Secretary for ETA:

1. Require TCD to take steps to ensure that documentation of eligibility is obtained and retained in accordance with program regulations so that eligibility can be independently verified.
2. Recover the \$684 in questioned costs.

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\* - \$2,442 is the point estimate of questioned costs using a confidence level of 90 percent.

## **2. Performance Data Reviewed Were Accurate and Properly Supported**

We reviewed the data reported by TCD on the Program Status Summary to determine whether this information was accurate and properly supported. We were able to verify the overall totals reported when we compared the information to the databases TCD maintained. A summary of this data can be found on Schedule B - Schedule of Performance Reported.

Our testing of this data included reviewing the underlying support for the preparation of the Program Status Summary as a whole, and reviewing the reported program information for the sample of participants selected for testing. The results of our review agreed with the reported outcomes for those participants that exited the program.

**Finding 1** has a possible impact on the performance data. Based on the information in the finding, the eligibility of some participants who only received services and exited the program was improperly documented. We do not question the number of participants reported as service only exits (135), but based on our sample results in **Finding 1**, some of those reported may be questionable as to their eligibility for the program overall due to lack of documentation.

TELAMON CORPORATION  
DELAWARE

**SCHEDULE OF COSTS REPORTED**  
**Program Year Ended June 30, 2001**

<b><u>Financial Status Report</u></b>	<b><u>Reported</u></b>
1. Classroom Training	\$ 47
2. On-the-Job Training	0
3. Work Experience	0
4. Training Assistance	0
5. Services Only	55,254
6. Administration	7,370
7. All Other Program	<u>58,665</u>
<b>8. Total</b>	<b><u>\$ 121,336</u></b>

Terms Used Above:

- Classroom Training: Costs related to participants provided some form of organized classroom training. Generally includes tuition costs, stipends, and support provided while in training.
- On-the-Job Training: Costs paid to reimburse an employer for half of the wages paid to a participant during a contractual training period. Also includes support paid to the participant.
- Work Experience: Wages paid to a participant placed in a job by the grantee in order to assist the participant by gaining practical work experience.
- Training Assistance: This is a category carried over from JTPA generally not used under WIA reporting.
- Services Only: Costs related to participants that are only provided support service, with no enrollment in training programs.
- Administration: Salaries and overhead costs related to general administration of the program and not directly providing program services. Costs are limited under the grant agreement.
- All Other Program: Salaries and overhead related to overall running of the program not broken out in any category above.

**TELAMON CORPORATION  
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**SCHEDULE OF COSTS REPORTED**  
**Supplemental Information**  
**Program Year Ended June 30, 2001**

<b><u>Category</u></b>	<b><u>Incurred Costs</u></b>	<b><u>Subtotals</u></b>
1. Classroom Training		
A Allowances	\$ 34	
B Supportive Services	<u>13</u>	47
2. On-the-Job Training	\$ <u>0</u>	0
3. Services Only		
A. Salaries and Fringe Benefits	\$ 24,482	
B. Office Costs and Overhead	11,771	
C. Supportive Services	<u>19,001</u>	55,254
4. Training Assistance	\$ <u>0</u>	0
5. Work Experience	\$ <u>0</u>	0
6. Administration		
A. Indirect Administration	\$ 7,243	
B. Miscellaneous Other	<u>127</u>	7,370
7. Other Program		
A. Salaries and Fringe Benefits	\$ 40,803	
B. Office Costs and Overhead	<u>17,862</u>	<u>58,665</u>
<b>8. Total</b>	<b><u>\$121,336</u></b>	<b><u>\$121,336</u></b>

Note: The above information is not required to be reported to ETA, and was created by reviewing the financial records used in preparation of the Financial Status Report.

**TELAMON CORPORATION  
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**SCHEDULE OF PERFORMANCE REPORTED**  
**Program Year Ended June 30, 2001**

<b><u>Category</u></b>	<b><u>Planned</u></b>	<b><u>Reported</u></b>
Total Participants	110	150
Total Terminations	109	150
Entered Unsubsidized Employment	15	13
Direct Placement	-	-
Indirect Placement	-	-
Also Obtained Employability Enhancement	-	-
Employment Enhancement Only	-	-
Services Only	-	135
All Other Terminations	94	2
Total Current Participants (End of Period)	1	0

**Schedule B-Continued**

**TELAMON CORPORATION  
DELAWARE**

**SCHEDULE OF PERFORMANCE REPORTED**  
**Program Year Ended June 30, 2001**

**Terminology Used**

Participants	Disadvantaged migrant and seasonal farmworkers and their dependents
Total Participants -	Participants that were provided any services during the program year. Includes participants carried over, new participants, and those exiting during the program year.
Total Terminations -	Participants that exited the program during the year.
Entered Unsubsidized Employment -	Participants placed in a non-federally subsidized job.
Direct Placement -	Participants referred directly to a job with no training services provided. (Detail not required to be reported under WIA)
Indirect Placement -	Participants placed in a job after training or enhancement services. (Detail not required to be reported under WIA)
Also Obtained Employability Enhancement -	Participants placed that also received services improving job prospects, such as completing GED program, obtaining a degree, completing occupational training. (Detail not required to be reported under WIA)
Employment Enhancement Only -	Participants not placed in a job but exiting the program with enhancements to improve job prospects. See examples above. (Detail not required to be reported under WIA)
Services Only -	Participants that exited the program with support services only, with no training or referral to employment.
All Other Terminations -	Participants that exited the program that do not fall into any other termination category.

**Appendix A**  
**Response to Draft Report by Telamon Corporation - Delaware**





**Telamon Corporation**  
3937 Western Boulevard  
Post Office Box 33315  
Raleigh, North Carolina 27636-3315

**Richard A. Joanis**  
Executive Director  
919.851.7611 x201  
[Djoanis@telamon.org](mailto:Djoanis@telamon.org)

September 13, 2003

Deborah Outten-Mills, Director  
National Audit and Evaluations Office  
U.S. Department of Labor  
Office of Inspector General  
200 Constitution Avenue, NW, Room N-5620  
Washington DC 20210

Re: Report No. 21-03-019-03-365

Dear Ms. Outten-Mills:

This is to respond to the above-referenced audit report, addressed to Karen Webster, Maryland/Delaware State Director. The report results were generated by representatives of the Office of Inspector General who reviewed customer eligibility documentation and a review of fiscal systems by the audit team, for Grant Number AC-10741-00-55, issued under authority of the Workforce Investment Act of 1998 (WIA) in the amount of \$125,899 to provide services to migrant and seasonal farmworkers in Program Year 2000.

The report questioned costs of services to National Farmworker Jobs Program customers in the amount of \$684 based on the opinion of the individuals who visited the Dover office that program files for 10 participants lacked "sufficient documentation to enable [Telamon] to determine their eligibility." The report also indicates, based on the review by the auditors that, in all other respects, the Delaware program met performance guidelines and expectations.

**Lack of Documentation - Finding**

The Auditors' report questions and requests recovery of \$684 in grant charges for participant services based on a conclusion that ten applicant files reviewed did not prove eligibility as they did not contain copies of documentation required by grant regulations to support eligibility. The report neither lists names or other identifiers of said participants, nor does it specify the nature of documentation said to be lacking, nor does it cite regulations denoting same. The report does cite NFJP Bulletin No. 00-02, which obligates grantees to verify documentation, as well as §669.360(b) of the WIA regulations, which cautions that expedited eligibility does not obviate the need to verify work authorization or compliance with Selective Service registration requirements.

Statements in the draft report include:

- o "At a minimum there should be documents for all files that verify identity, work eligibility, and compliance with selective service registration as noted above."
- o "We reviewed the participant's files and discovered that ten did not contain the documentation required by regulations to support the participant's [sic] eligibility."

### **Lack of Documentation – Response**

Our system of procedures for determining and documenting eligibility of NFJP applicants is constructed on the basis of the Workforce Investment Act, regulations at §669, Policy Guidance published at Bulletin 00-02 and sound business practices. Specific procedures for all functions of all NFJP activities, including eligibility determination, are published in the corporation's WIA Operations Manual, which was presented to the Auditors for their review. With respect to verification of an applicant's available supplemental documentation, our procedures are based on those of law enforcement agencies. In this regard, Manual instructions say:

"Determination of eligibility should be supported by available documentation showing authorization to work, draft registration, work history and income level. Copies should be made of all available documents for the customer service folder, and notation should be made on each copy concerning whether it has a seal, is notarized, or otherwise appears to be authentic. In no case should we keep original documents such as I-9's, draft registrations, or documentation showing work history and income including check stubs, W-2's, or other income tax forms."

The foregoing instruction takes into account the probability that, unlike applicant contacts in local offices, outreach to remote labor camps would be done without benefit of electronic photocopiers. In these cases, employees are instructed to view documents and record their identifying alpha-numeric characters (i.e. license and social security numbers, authorization card symbols, etc.). On the application form itself ( Part II - Exhibit A) there is clear direction to note both the documents viewed and their identifiers. As well, instructions are clear (and we believe, proper) that we do not take individuals' personal identification or other documents for our files.

It is our contention that the process of requesting documents, reviewing and copying or making notations of them constitutes compliance with NFJP guidance in this regard.

"Attestation," as described in Bulletin 00-02 is "...a statement attesting that the information provided to the grantee for making its determination of the applicant's eligibility to receive services, is true and accurate to the best of his/her knowledge." Further, the Bulletin states that "The applicant authenticates the information by signing the certification statement used by the grantee." With respect to the auditors' contention that no applicants' attestations were recorded, we contend (see attachments) that each and every applicant for NFJP services from Transition Resources must certify that the information they have provided is true and accurate. On the application form (Part I - Exhibit B), above the applicant signature line, the statement reads:

"I authorize Telamon/Transition Resources to share information I have provided with other WIA One-Stop partners. I authorize access to any information concerning myself that is available from other WIA partners. This information is subject to review and verification, and I may have to provide documents to support it. I am aware that I may be denied services if and when I am found ineligible to receive services, and that I may be prosecuted if I have given false information. I all release of this information for verification purposes. I understand this statement as it has been read or explained to me. I have received a copy of complaint procedures."

It is our contention that all of the applications cited in the auditors' report did contain signed attestations by the participants sampled for this review. (See Exhibit(s) C.)

Although the report does not specify what exactly was questionable about the files examined, a response to preliminary findings was sent to Mr. Terry Terrell of the OIG on January 2, 2002. In that letter from Ms. Karen Webster, State Director, she stated:

*It is our policy to go to the greatest extent possible to insure the eligibility of the individuals seeking our assistance. The summer of 2000 was one of transition from JTPA to WIA and a time for educating farmworkers coming to Delaware of the proper identification required in order to receive services. Although the finding does not account for the fact that many migrant farmworkers do not have conventional identification, it is nevertheless part and parcel to their economic status. In all but three of the cases cited in the finding, the clients reviewed had some form of identification and a copy of that was in the folder. Consistent with our policy, we indicate which documents are viewed; and make copies of them when it is practical (contact at an office as opposed to the field) to do so. We are otherwise unaware of a regulatory requirement to photocopy documents.*

In addition, she provided a list of the file review names and a description of documents that were either copied or noted as reviewed. Included were:

DE State ID and number

Copy of FL driver's license and copy of strange looking ss card with address matching the driver's license

Copy of ss card

SS#

Copy of ss card and non government picture ID

SS#

Copy of DE picture social service ID with ss#

Copy of current DE picture social service ID

Copy of picture ID from a health clinic

Copy of picture ID, non government

All of these customers were U.S. citizens and either female or, if male, beyond the age requirement for Selective Service registration. In view of this evidence, we believe that procedures in place to verify available eligibility documents of all applicants, including those who make contact with outreach staff in remote areas, were adequate and in compliance with regulations and other guidance for the NFJP.

It is further critical to note, as the reviewers did, that funds expended in these cases were nominal emergency assistance amounts; and that when participants desire to enter training, additional verification procedures are in place to prevent misexpenditures on ineligible applicants. In this regard, we request relief of these questioned costs under sections 184 (c) and (d) of the Workforce Investment Act and section 677.720 of WIA regulations.

### **Summary**

We believe that Telamon Corporation employs systems more than adequate to safeguard federal funds, though they may be subject to error from time to time. With respect to the report in question, we believe that systems in place are adequate to make sound determinations of eligibility for the National Farmworker Jobs Program, including quick and direct action to end services if subsequent reviews or information tell us that a mistake was made. Except that the reviewers opined that more documentation would satisfy them, we know of no other procedures that would extract additional personal documentation and remedy the applicants' needs for emergency assistance.

Moreover, we do not believe that errors noted in the report, if indeed there were errors, could be characterized as willful disregard of requirements, gross negligence or failure to observe accepted standards of administration; and we hope the Department will agree.

Thank you for the opportunity to answer these findings.

Sincerely,



Richard A Joanis  
Executive Director

Exhibits:    A – Application for Enrollment Part II  
              B – Application for Enrollment Part I  
              C – File copies

c:     Karen Webster  
       Alina Walker

1. OFFICE NUMBER

TELAMON CORPORATION  
TRANSITION RESOURCES CORPORATION  
APPLICATION FOR ENROLLMENT PART II

2. PROGRAM  
 Adult 167  
 Youth  
 Other

3. APPLICANT'S NAME (Last) \_\_\_\_\_ (First) \_\_\_\_\_ (MI) \_\_\_\_\_  
 4. BIRTH DATE \_\_\_\_/\_\_\_\_/\_\_\_\_ 5. SOCIAL SECURITY NUMBER \_\_\_\_-\_\_\_\_-\_\_\_\_ 6. GENDER:  MALE  
 FEMALE  
 7. CURRENT ADDRESS \_\_\_\_\_ ZIP \_\_\_\_\_ (FIPS Code) \_\_\_\_\_  
 8. HOME ADDRESS \_\_\_\_\_ ZIP \_\_\_\_\_ (FIPS Code) \_\_\_\_\_  
 9. HOME OR CONTACT PHONE \_\_\_\_\_ 10. EMERGENCY CONTACT \_\_\_\_\_

11. RACE  
 ASIAN  
 WHITE  
 BLACK OR AFRICAN AMERICAN  
 AMERICAN INDIAN OR ALASKAN NATIVE  
 HAWAIIAN OR OTHER PACIFIC ISLANDER

12. FARMWORKER STATUS  
 MIGRANT  
 SEASONAL

13. BARRIERS TO EMPLOYMENT (check for yes)  
 LIMITED ENGLISH PROFICIENCY  
 OFFENDER  
 HOMELESS (include runaway youth)  
 DISPLACED HOMEMAKER  
 LACKS SUFFICIENT WORK HISTORY  
 LONG TERM AGRIC. EMPLOYMENT  
 PREGNANT OR PARENTING YOUTH  
 SUBSTANCE ABUSE  
 LACKS TRANSPORTATION  
 SINGLE HEAD OF HOUSEHOLD WITH DEPENDENTS UNDER AGE 18  
 INDIVIDUAL WITH A DISABILITY  
 TANF EXHAUSTEE

15. LABOR FORCE  
 EMPLOYED  
 UNEMPLOYED
16. U.J. STATUS  
 CLAIMANT  
 EXHUASTEE  
 NONE

14. ETHNICITY  
 HISPANIC  
 NOT HISPANIC

18. HOUSING STATUS  
 HOMELESS  
 SINGLE FAMILY  
 MULTI-FAMILY  
 CAMP  
 MOBILE HOME

17. BASIC LITERACY SKILLS DEFICIENT  
 YES  NO

19. WOULD MOVE TO SUBSIDIZED FARMWORKER HOUSING IF AVAILABLE  
 YES  
 NO

20. OWNERSHIP OF DWELLING  
 RENT  
 OWN  
 OTHER

21. DWELLING OVERCROWDED  
 YES  
 NO

22. IMMEDIATE NEEDS (CHECK IF YES)  
 NUTRITIONAL  
 CHILD CARE  
 MEDICAL  
 TRANSPORTATION

23. SELECTIVE SERVICE  
 REGISTERED  
 NOT REQUIRED  
 WAIVER

24. VETERAN STATUS  
 YES  
 NO

25. TOTAL FAMILY SIZE \_\_\_\_\_  
 26. UNDER AGE 18 \_\_\_\_\_  
 27. CHILDREN 0-5 \_\_\_\_\_

28. EDUCATION STATUS ( COMPLETED )  
 \_\_\_ 0 NO SCHOOL GRADE  
 \_\_\_ 01-11 ELEMENTARY/SECONDARY  
 \_\_\_ 12 H.S. GRADUATE  
 \_\_\_ 88 GED  
 \_\_\_ 13-15 POST H.S. ( TECH, VOC. COL. )  
 \_\_\_ 16 BACHELOR'S DEGREE  
 \_\_\_ 17 BEYOND BACHELOR'S DEGREE

29.  STUDENT AT TIME OF ENROLLMENT ( PART-TIME / FULL-TIME )

30. PUBLIC ASSISTANCE RECEIVED  
 TANF  
 GA, RCA, SSI/SSA  
 FOOD STAMPS

31. DOCUMENTS PRESENTED TO VERIFY INCOME  
 CHECK STUBS  
 W-2 FORMS  
 TAX RETURNS  
 OTHER \_\_\_\_\_

32. DOCUMENTS USED TO VERIFY WORK AUTHORIZATION  
 S.S. CARD  DRIVERS LICENSE (state) \_\_\_\_\_ (#) \_\_\_\_\_  
 PICTURE IDENTIFICATION (state) \_\_\_\_\_ (#) \_\_\_\_\_  
 INS CARD (#) \_\_\_\_\_ (Exp. Date) \_\_\_\_\_

- BIRTH CERTIFICATE  
 OTHER \_\_\_\_\_

33. APPLICANT REFERRED BY ONE-STOP?  YES  NO 34. TODAY'S DATE \_\_\_\_/\_\_\_\_/\_\_\_\_

35. COMMENTS

1. OFFICE NUMBER \_\_\_\_\_

**TELAMON CORPORATION  
TRANSITION RESOURCES CORPORATION**

2.. PROGRAM  
 ADULT 167  
 YOUTH  
 OTHER

**APPLICATION FOR ENROLLMENT PART I**

3. NAME OF APPLICANT \_\_\_\_\_ 4. SOCIAL SECURITY # \_\_\_\_\_  
 5. APPLICANT IS A :  FARMWORKER, OR A  
 DEPENDENT OF \_\_\_\_\_ SOCIAL SECURITY # \_\_\_\_\_  
 6. IF APPLICANT IS A DEPENDENT, IS THE FARMWORKER ENROLLED IN THE ADULT 167 PROGRAM?  YES  NO

7. FARMWORKER'S WORK HISTORY – MUST INCLUDE 12 CONSECUTIVE MONTHS (See Operations Manual for Instructions)						
EMPLOYER INFORMATION	DATES		NUMBER OF DAYS		AMOUNT RECEIVED	
	FROM	TO	FARM	NON-FARM	FARM	NON-FARM
NAME: ADDRESS: ACTIVITY:						
NAME: ADDRESS: ACTIVITY:						
NAME: ADDRESS: ACTIVITY:						
NAME: ADDRESS: ACTIVITY:						
TOTALS						
TOTAL FARMWORKER INCOME						
TOTAL OTHER FAMILY INCOME						
TOTAL INCOME						
GUIDELINE AMOUNT						

8. Check if ATTACHMENT A is required  :  
 9. Total Number in the Family  [ ]

10. CERTIFICATION: To be read to the applicant and/or translated into his/her primary language  
 I authorize Telamon/Transition Resources to share information I have provided with other WIA One-Stop partners. I authorize access to any information concerning myself that is available from other WIA partners. This information is subject to review and verification, and I may have to provide documents to support it. I am aware that I may be denied services if and when I am found ineligible to receive services, and that I may be prosecuted if I have given false information. I allow release of this information for verification purposes. I understand this statement as it has been read or explained to me. I have received a copy of complaint procedures.

Applicant's Signature \_\_\_\_\_ DATE \_\_\_\_/\_\_\_\_/\_\_\_\_

11. Farmworker meets WIA Section 167 Eligibility requirements:  YES  NO  
 12. Farmworker may receive services pursuant to WIA Sections 188(a)(5) or 189(h):  YES  NO  
 13. If response to item 12 is NO, Applicant/Dependent may receive services pursuant to WIA Sections 188(a)(5) or 189(h):  YES  NO  
 14. Employee Signature \_\_\_\_\_ 15. Employee No. \_\_\_\_\_  
 16. Reviewer Signature \_\_\_\_\_

DISTRIBUTION: ORIGINAL TO THE CORPORATE OFFICE – COPY TO LOCAL OFFICE FILES

EXHIBIT C  
(Exhibit C omitted due to Personal Information)